

REMARKS

The Examiner is thanked for the performance of a thorough search and for considering the references submitted in the Information Disclosure Statements filed by the Applicants on July 15, 2005 and October 11, 2005.

Claims 1, 5, 12, 16, 22, 26, 32, and 36 have been amended. Claims 6, 17, 27, and 37 have been canceled. No claims have been added. Hence, Claims 1, 5, 7-12, 16, 18-22, 26, 28-32, 36, and 38-41 are pending in the application.

I. APPLICANTS' STATEMENT OF INTERVIEW

The Examiner is thanked for extending the courtesy of a telephone interview on March 9, 2006. Applicants' representatives Christopher J. Palermo and Stoycho D. Draganoff, and Examiner Baoquoc To participated in the interview. The claims discussed were Claims 1, 5, and 6. The reference discussed was Hennessey et al., U.S. Patent No. 6,360,216 ("HENNESSEY").

The Applicants pointed out that the features of Claim 6 are not described or suggested by HENNESSEY, and proposed to incorporate the subject matter of Claim 6 into the independent claims in order to place present application in condition for allowance. The Examiner indicated that the subject matter of Claim 6 distinguishes over HENNESSEY.

II. INDEPENDENT CLAIM 1

The Office Action has rejected Claim 1 as allegedly anticipated under 35 U.S.C. § 102(e) by HENNESSEY.

Claim 1 has been amended herein to incorporate the subject matter of Claim 6, and features:

...;
storing a plurality of names for a single entity associated with the enterprise as a first plurality of corresponding concepts ..., wherein each name of the plurality of names is associated with a particular concept of the first plurality of corresponding concepts;

...;
storing in the database a first relationship of a first relationship type, the first relationship defined for the first concept and an alternative concept of the first plurality of corresponding concepts, **wherein the first relationship includes an attribute indicating the alternative concept is one of a synonym for the first concept, an acronym for the first concept, and a translation into a different language than a language of the first name corresponding to the first concept;**
... .

Thus, in Claim 1 a first relationship of a first relationship type is stored in the database, where the first relationship is defined between the first (normative) concept of the first plurality of corresponding concepts and an alternative concept of the first plurality of corresponding concepts. The first relationship includes an attribute indicating the alternative concept is one of a synonym for the first concept, an acronym for the first concept, and a translation into a different language than a language of the first name corresponding to the first concept.

The Office Action asserts that the above features of Claim 1 are described in col. 9, lines 39-48 of HENNESSEY. This is incorrect.

Nothing in HENNESSEY describes, teaches, or suggests the above features of Claim 1. Specifically, HENNESSEY does not teach or suggest that its product catalog database stores or maintains a relationship that may include an attribute of any kind. Further, HENNESSEY does not teach or suggest that its product catalog database may store synonyms, acronyms, or translations of product names. In fact, HENNESSEY does not even mention any of the terms “synonym”, “acronym”, and “translation.”

In col. 9, lines 27-48, HENNESSEY states:

A user may thereby locate **useful alternative products 304 by searching at a higher level of generality.** FIG. 9 illustrates that each function 801 (from FIG. 8) **may be organized as part of a hierarchical tree structure, each function 801 either being on the top level such as top level functions 901-903, or having a link to a parent function 801, such as second level functions 911-917 and third level functions 921-925.** The same hierarchical structure illustrated by FIG. 9 applies to objects 802 and methods 803 (see FIG. 8), each of which may be in the top level or may have a parent of its own type. Although the example herein illustrated shows three levels, there may in actuality be one or more levels, and

there is no upper limitation on the number of levels. By way of further example, consider the user seeking alternatives to a ballpoint pen. The method 803 described as "ink" may have a more general parent method 803 described as "liquid," which may itself have a parent method 803 described as "matter" at the highest level of generality. If the user moves to the most general method 803, "matter," rather than the specific method 803 "ink," the user may locate pencils, fine paintbrushes, chalk, charcoal, or laser printers, all of which use matter other than ink to mark paper or write information.

The above passage of HENNESSEY generally describes a hierarchical tree structure that represents product functionalities. (See also HENNESSEY, FIGs. 8 and 9.) Each level of the hierarchical structure represents a generalization of a product functionality, where higher levels represent more generalized functionality than lower levels. Significantly, however, neither the above passage nor anything else in HENNESSEY describes or suggests that the relationships established between product functionalities at different hierarchical levels may include any attribute that may be equivalent to the attribute of Claim 1 which indicates that the alternative concept is one of a synonym for the first concept, an acronym for the first concept, and a translation into a different language than a language of the first name corresponding to the first concept.

Further, in HENNESSEY the product functionalities are arranged in a strict **vertical hierarchy**, where a higher level of the hierarchy represents a more generalized product functionality than the functionality represented by a related lower level. Thus, the relationships between the hierarchical levels in HENNESSEY are essentially parent-child relationships. In contrast, in Claim 1 the first plurality of corresponding concepts corresponds to a plurality of alternative names of **the same entity**; thus, any relationships among concepts of the first plurality of corresponding concepts of Claim 1 are more akin to relationships between siblings arranged at the same level.

Finally, with respect to the generalization hierarchy described in the above passage from HENNESSEY, the Office Action asserts in page 5 that "pencils, fine paintbrushes, chalk,

charcoal, or laser printer are synonyms under matter.” This is incorrect. While one may generalize pencils, fine paintbrushes, chalk, charcoal, or laser printer as some sort of matter, one cannot possibly consider that the term “pencil” is a synonym of any of the terms “laser printer”, “paintbrush”, “chalk” or “charcoal.” (To put it differently, a pencil is a completely different product than, for example, a laser printer.)

For the reasons stated above, HENNESSEY does not describe, teach, or suggest the feature of Claim 1 of storing in the database a first relationship of a first relationship type, the first relationship defined for the first concept and an alternative concept of the first plurality of corresponding concepts, wherein the first relationship includes an attribute indicating the alternative concept is one of a synonym for the first concept, an acronym for the first concept, and a translation into a different language than a language of the first name corresponding to the first concept. In addition, HENNESSEY does not teach or suggest several other features of Claim 1. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those several other features is not included at this time.

Since HENNESSEY does not describe or suggest all features of Claim 1, Claim 1 is not anticipated under 35 U.S.C. § 102(e) by HENNESSEY. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

III. INDEPENDENT CLAIMS 12, 22, AND 32

Independent claims 12, 22, and 32 have been rejected as allegedly anticipated under 35 U.S.C. § 102(e) by HENNESSEY.

Claims 12, 22, and 32 include features similar to the features of Claim 1 discussed above. For this reason, it is respectfully submitted that Claims 12, 22, and 32 are patentable under 35 U.S.C. § 102(e) over HENNESSEY for at least the reasons given above with respect to Claim 1.

Reconsideration and withdrawal of the rejections of Claims 12, 22, and 32 is respectfully requested.

IV. DEPENDENT CLAIMS 5, 7-11, 16, 18-21, 26, 28-31, 36, AND 38-41

Claims 5, 7-11, 16, 18-21, 26, 28-31, 36, and 38-41 have been rejected as allegedly anticipated under 35 U.S.C. § 102(e) by HENESSEY.

Claims 5, 7-11, 16, 18-21, 26, 28-31, 36, and 38-41 are dependent upon one of independent Claims 1, 12, 22, and 32, and thus include each and every feature of their corresponding base claim. Therefore, each of Claims 5, 7-11, 16, 18-21, 26, 28-31, 36, and 38-41 is allowable for the reasons given above for Claims 1, 12, 22, and 32. In addition, each of Claims 5, 7-11, 16, 18-21, 26, 28-31, 36, and 38-41 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 5, 7-11, 16, 18-21, 26, 28-31, 36, and 38-41 are allowable for the reasons given above with respect to Claim 1, 12, 22, and 32.

VI. CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firms check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of

this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

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Stoycho D. Draganoff
Reg. No. 56,181

2055 Gateway Place, Suite 550
San Jose, California 95110-1089
Telephone No.: (408) 414-1080 ext. 208
Facsimile No.: (408) 414-1076